

**Crest Nicholson Strategic Land & Planning and
Bellway Homes Limited (Southern Counties)**

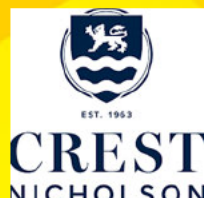
Local Plan Examination

Matter 2 Housing Supply and Headroom | Hearing Statement

Date of report: 10th April 2026

Representor Number: 1194442

PREPARED FOR



Matter 2: Housing Supply and Headroom

Inspector's Key Considerations for Matter 2

- a. *The housing supply trajectory as proposed*
- b. *The reliability of housing delivery assumptions / allowance for non-delivery*
- c. *The reliability of assumptions about windfalls*
- d. *The robustness of the trajectory*
- e. *Maintaining adequate housing land supply including a rolling 5 year supply*
- f. *Headroom, resilience and the mitigation of risk*
- g. *Whether the housing requirement should be stepped*
- h. *Whether additional housing allocations are required, and if so, of what kind / size / timing*

- 1.1 This statement is submitted by Savills Planning on behalf of Crest Nicholson Strategic Land & Planning (herein referred to as 'Crest') and Bellway Homes Limited (Southern Counties) (herein referred to as 'Bellway') in relation to their land interest Land East of Billingshurst which is an emerging strategic allocation (emerging Policy HA4). This statement is in response to Matter 2 (Housing Supply and Headroom) and focuses on criteria a, b, d and e listed above. No comments are made in respect of criteria c, f, g and h. The statement expands upon previous representations submitted by Savills, on behalf of Bellway and Crest, including the Regulation 19 representations in March 2024 and the previous Matter 8 Hearing Statement submitted to Horsham District Council (HDC) in November 2024.
- 1.2 Since it was confirmed in February that an initial set of Hearing Sessions will proceed for HDC's Local Plan under the new examining Inspector Jonathan Bore, Topic Papers and evidence base documents have been made available by HDC. Those of the most relevance to Matter 2 are listed below and have been reviewed by Savills to inform this Statement:
 - Matter 2 Housing Supply and Headroom Topic Paper (HDCJB05)
 - Appendix 1 Housing Supply and Headroom Topic Paper – Trajectory (HDCJB05a)
 - Northern West Sussex Housing Market Area Update 2026 (HDCJB06)

Introductory / General Comment re: New NPPF

- 1.3 It is important to recognise that the emerging Local Plan is to be examined under the 2023 National Planning Policy Framework (NPPF) however, the Local Plan will be implemented under the draft NPPF (2025) once this is formal national policy later in 2026.
- 1.4 Annex 1 of the draft NPPF (2025) paragraph 1 confirms:

"The policies in this Framework are material considerations which must be taken into account in decision-making from the day of its publication".
- 1.5 Annex 1 of the draft NPPF (2025) paragraph 2 goes onto state:

“Development plan policies which are in any way inconsistent with the national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework”.

1.6 Draft NPPF (2025) Policy DM7 ‘Relationship with Other Regulatory Regimes’ at criteria 2 sets out that:

“Planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes other than where there is a development plan policy in place applying optional technical standards for the development proposed (see policy PM13)”.

1.7 Bellway and Crest highlight this point, as the emerging Local Plan will be implemented alongside the new NPPF, as a significant material consideration. Hence, in approaching Main Modifications, the Council should be mindful of its onward compatibility. This is more relevant for Matter 3.

Land East of Billingshurst (Policy HA4)

1.8 As per the area of the emerging Allocation HA4, the location of the site, its surroundings and the vision for the Land East of Billingshurst were set out in detail in the representations made to the R18 and the R19 Plan consultation (Respondent ID: 1194442). For the avoidance of doubt, this includes the land being promoted by Bellway and Crest and the approved Amblehurst Green development which all sits within the area of the emerging allocation HA4 – hence the promotion within HA4 is for approximately 700 dwellings – thus at least 650 overall is achievable. This site-specific comment, is simply made for context, and as the site is a draft allocation in the emerging Local Plan. Bellway and Crest made a number of site-specific representations on emerging HA4 in the Regulation 19 representations – which will no doubt be addressed later in the Examination Hearings process (alongside any relevant comments on the Main Modifications proposed for HA4).

1.9 Bellway and Crest support the overall strategy of the emerging Local Plan and broadly welcomes the Council’s approach to housing delivery, including the allocation of the site. The comments below are directed specifically to Matter 2 and seek to ensure that the housing supply trajectory and associated assumptions are realistic, resilient and capable of maintaining an adequate housing land supply throughout the Plan period. These are made in the context of Allocation HA4 only.

a. The housing supply trajectory as proposed

1.10 The Matter 2 Topic Paper prepared by HDC identifies a supply of 15,430 dwellings over 2023-2040 which includes completions, commitments, strategic site allocations, smaller site allocations and windfall dwellings. When Crawley Borough Council’s unmet need is taken into account (discussed further in HDC’s Matter 1 Topic Paper), this results in a shortfall of 2,398 dwellings against the proposed requirement of 17,828 dwellings.

1.11 On the basis of a start date of the emerging Local Plan of 1st April 2023, Land East of Billingshurst (Draft Policy HA4) has been included in the trajectory based on delivering residential units from 2032/33 (Y10) until 2039/40 Y17 and will provide at least 650 new residential units during the plan period (likely approximately 700 dwellings). These timeframes vary from those provided by Bellway and Crest to the Council in February 2026 which set out that delivery could potentially start as early as 2028/29 and hence make an earlier contribution to the Council’s housing land supply if the emerging Local Plan proceeds, which both Bellway and Crest are supportive of (see Figure 1).

Year	Crest Land Delivery	Bellway Land Delivery	Total
2028/29		25	25
2029/30	75	75	150
2030/31	75	75	150
2031/32	100	75	175
2032/33	75	75	150
			650

Figure 1: Bellway and Crest – present anticipated delivery of East of Billingshurst

(Note – this excludes the northern element of HA4 – within Amblehurst Green)

- 1.12 This is on the basis of a planning application submission late 2026. The reason for the delay in the application had been Water Neutrality, which on the basis of the announcement of October 2025 is no longer an issue. The land within Amblehurst Green already benefits from planning permission (ref. DC/13/0735) (nearly entirely implemented) – a separate application will be forthcoming in due course for additional residential development – thus the overall capacity is approximately 700 dwellings.
- 1.13 Hence, overall, whilst Bellway and Crest do not object to the housing supply trajectory per se – they do wish to state onward confidence of the emerging Strategic Allocation HA4 to deliver homes, including within the next five years.

b. Reliability of Housing Delivery Assumptions / Allowance for Non-Delivery

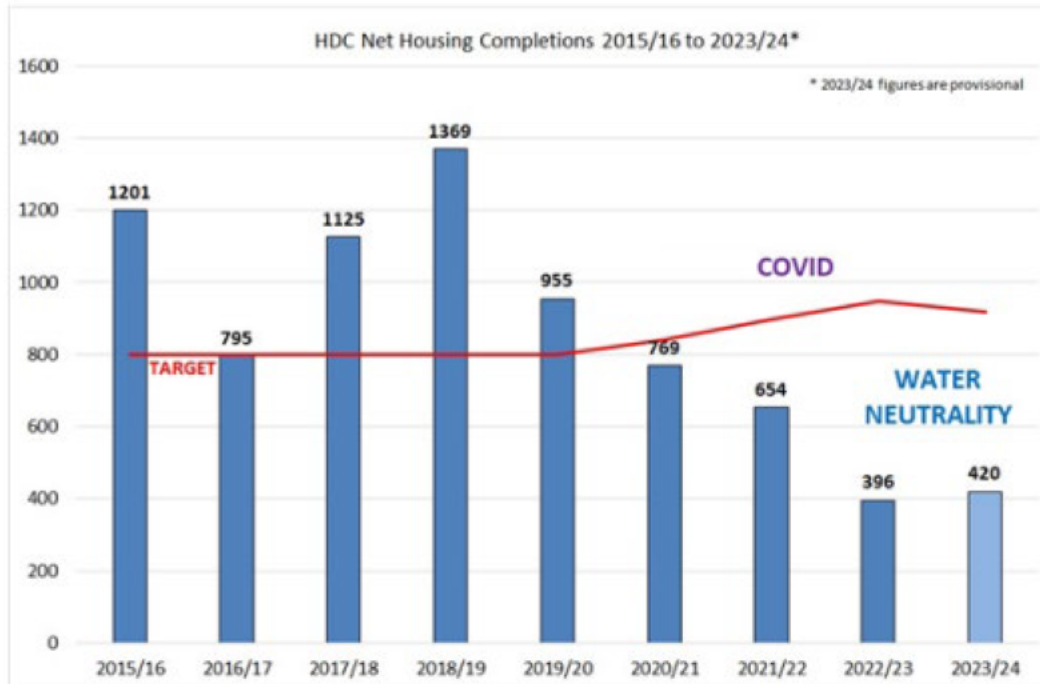
- 1.14 HDC’s Matter 2 Topic paper explains that delivery assumptions have been informed by engagement with site promoters, the Council’s experience of historic build-out rates, site specific phasing and infrastructure considerations. Bellway and Crest have historically engaged with HDC as part of this process, including the most recent engagement in February 2026 and this approach is welcomed. In this context, it is worth noting that a PPA had been in place for a number of years, from circa 2022 – 2024, and to inform the emerging Strategic Allocation HA4, a draft planning application was being devised. This work is due to recommence shortly.
- 1.15 However, it is considered that HDC’s delivery assumptions do need to factor site scale and location. Allocation HA4 will be an urban extension to the second settlement of the District, Billingshurst. It is of medium scale, rather than large strategic. The Council will need to have in mind the longer term complexities associated with major large scale development, which are more likely to be phased over a longer timeframe.
- 1.16 It is advised that HDC consider a modest contingency to be applied across the housing trajectory to demonstrate further that the emerging Local Plan can accommodate inevitable delays without undermining HDC’s future housing land supply.

d. The Robustness of the Trajectory

- 1.17 As explained in the Topic Paper for Matter 2, the housing trajectory has been informed by historic delivery, the Housing Delivery Study (H02/H03) and the pre-Water Neutrality housing delivery performance. However, it is considered that past performance should not be relied on solely due to the materially different context today which includes a loss of momentum over the course of the water neutrality period and reduced pipeline of permissions. In the period before 2020, HDC had, historically, been delivering a high rate of housing – above target (on the back of the 2006 Core Strategy and 2015

HDPF), mostly above 1,000 dwellings per annum (period 2015-19) – see Figure 2. This indicates historically strong market capacity for growth – which is not surprising given the Gatwick Diamond location of the District.

Figure 2: Historic Net Housing Completions (taken from HDC Housing Delivery Test April 2025)



- 1.18 It can be seen from Figure 2 that where Horsham are not impeded by Covid and Water Neutrality, delivery rates within the District are very strong. Bellway and Crest would implore HDC to plan positively for growth in the District and seek to match their previous delivery rates.
- 1.19 The trajectory is also strongly reliant on emerging strategic allocations which emphasises the importance of these sites coming forward from the middle of the plan period, in order to make a strong contribution to the Council's housing land supply. See paragraph 1.11 above. Hence, in judging the overall soundness of the plan, the Council will need to be mindful of wider policy burdens, to ensure consistency with the NPPF, and the required stimulus for growth.

e. Maintaining adequate housing land supply including a rolling 5 year supply

- 1.20 Maintaining a five-year supply over the course of the Local Plan period is crucial to ensure decision-making certainty, appeal resistance and public confidence. The early years of the period remain sensitive to delay, particularly where delivery is concentrated on larger sites with long lead-in times. This is especially relevant for HDC's emerging Local Plan given that the base date for the Plan period is 2023.
- 1.21 Thus deliverable allocated sites capable of coming forward in the short to medium term make an important contribution to supply and supporting the maintenance of a rolling five-year housing land supply.
- 1.22 HDC's current housing land supply position is 1.7yrs (December 2025) and using the Sedgefield Method for assessing five year land supply the Council may not have a five year land supply from the

date of adoption, assuming this is in the 2026/27 against their own housing needs. This emphasises the importance of a) Main Modifications to ensure a sound plan, and b) swift implementation of the existing draft allocations (such as HA4), to ensure a meaningful contribution to the tail end of the five-year housing land supply.

Conclusions

- 1.23 Overall, Bellway and Crest support progressing the emerging Local Plan to adoption to help ensure the Council's housing land supply is maintained. Although Land East of Billingshurst is not expected in HDC's trajectory to deliver residential units until 2032/33 (Y10) through to 2039/40 Y17, Bellway and Crest consider the site can deliver housing earlier than this, as outlined in this Statement.
- 1.24 It is recognised that HDC's Matter 1 and Matter 2 Topic Papers highlight a shortfall of 2,398 homes, when Crawley's unmet housing needs are considered. Furthermore, there have been shortfalls in delivery in the early years of the plan period for numerous reasons, including Water Neutrality. This emphasises the importance of maximising delivery on the emerging strategic allocations.

END

Contact

Charles Collins MSc MRTPI
Director



Hannah Keyte MA MRTPI
Senior Planner



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